

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U338E) for Approval of its 2012- 2014 California Alternate Rates for Energy (CARE) and Energy Savings Assistance Programs and Budgets.

Application 11-05-017
(Filed May 16, 2011)

And Related Matters

Application 11-05-018
Application 11-05-019
Application 11-05-020

**DECISION GRANTING COMPENSATION TO CENTER FOR ACCESSIBLE
TECHNOLOGY FOR SUBSTANTIAL CONTRIBUTION
TO DECISION 12-08-044**

Claimant: Center for Accessible Technology (CforAT)	For contribution to: D.12-08-044
Claimed (\$): \$123,216.27	Awarded (\$): \$91,696.02 (Reduced by 25.58%)
Assigned Commissioner: Katherine J.K. Sandoval	Assigned ALJ: Kimberly H. Kim

PART I: PROCEDURAL ISSUES

A. Brief Description of Decision:	Decision (D.) 12-08-044 approves approximately \$5 billion to continue two energy-related low income programs, the Energy Savings Assistance (ESA) and the California Alternate Rates for Energy (CARE) Programs for Pacific Gas and Electric Company(PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SoCalGas), for the 2012-2014 program cycle.
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B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:

	Claimant	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	August 8, 2011	Two prehearing conferences were held on August 8 and September 6, 2011.
2. Other Specified Date for NOI:	N/A	
3. Date NOI Filed:	September 7, 2011	Verified
4. Was the NOI timely filed?		Yes
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	Application (A.) 11-05-017 <i>et al.</i>	Verified
6. Date of ALJ ruling:	October 20, 2011	Verified
7. Based on another CPUC determination (specify):	N/A	
8. Has the Claimant demonstrated customer or customer-related status?		Yes
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	A.10-03-014.	A.11-05-017
10. Date of ALJ ruling:	See ALJ Ruling in A.10-03-014, issued on October 31, 2011.	October 20, 2011
11. Based on another CPUC determination (specify):	N/A	
12. Has the Claimant demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.12-08-044	Verified
14. Date of Issuance of Final Order or Decision:	August 30, 2012	Verified
15. File date of compensation request:	October 29, 2012	Verified
16. Was the request for compensation timely?		Yes

PART II: SUBSTANTIAL CONTRIBUTION**A. Claimant's contribution to the final decision (see § 1802(i), § 1803(a) & D.98-04-059).**

Intervenor's Claimed Contribution	Specific References to Claimant's Presentations and to Decision	CPUC's Comment
<p>Affordability:</p> <ul style="list-style-type: none"> Center for Accessible Technology (CforAt) brought focus to the foundational importance of CARE and ESA Programs as affordability programs for low-income customers in general and also for its constituency, which is both disproportionately low-income and highly dependent on energy to support independent living. In its Opening Comments on the Proposed Decision (PD), CforAT addressed affordability at length and argued that the PD erred in failing to consider CARE's role as the state's primary affordability program. While not directly citing to CforAT's Comments, the revisions to the PD reflect multiple changes directly responsive to the identified issues, including removal of language indicating that CARE penetration rates "should raise some eyebrows" and identifying "loopholes" in the program. While these comments were filed separately by CforAT, they followed coordination with other consumer groups, and other consumer groups supported CforAT's discussion. 	<p>Prepared Testimony of Dmitri Belser Addressing the Concerns of the Disability Community Regarding the IOUs' Proposals for Eligibility and Administration of the CARE and ESA Programs (Belser Testimony) at 3-5; 1/23 Joint Consumer Response to ALJ Ruling (CforAT took lead in drafting response regarding affordability) at 2-10; Opening Brief at 1-2; Reply Brief at 6-7.</p> <p>CforAT's Opening Comments on Proposed Decision at 1-9 (also encompassing discussion of multiple other issues. The language in the PD that was subsequently modified is found in the PD at 176, discussed in CforAT's Opening Comments at 4, and is not included in the final decision. <i>See also</i> Revision 1 to the PD (Redlined version) at 213-216, showing revisions consistent with CforAT's comments.</p>	Verified

<ul style="list-style-type: none"> CforAT advocated for an updated Low Income Needs Assessment. The PD was silent on the need for an updated Low Income Needs Assessment, but the final decision includes a new study, to be completed by August of 2013 	<p>1/23 Response to ALJ Ruling at 9-10; Opening Brief at 27-28; Opening Comments on PD at 9.</p> <p><i>See</i> Revision 1 to PD (Redlined version) at 262-265 (adding section on an updated Low Income Needs Assessment); <i>see</i> also Final Decision at 256-259.</p>	
<p>CARE: High Use</p> <ul style="list-style-type: none"> In conjunction with other consumer groups, CforAT worked to ensure that efforts to address concerns about CARE consumers using large amounts of energy provided appropriate consumer protections, including effective notice (in accessible format), an appeals process, assistance in enrolling customers in Medical Baseline if appropriate, and other protections. The PD failed to incorporate the agreed-upon safeguards for the high-use program. CforAT addressed this error in its Comments and coordinated with other consumer groups who also addressed this issue. The final decision incorporates all of the agreed-upon safeguards. 	<p>CforAT was one of the joint sponsors of the Testimony of Hayley Goodson supporting in principle the idea of a review of the highest-usage CARE households and recommending safeguards to ensure that no high-use household would be removed from the program without due process. Through the course of the proceeding, as summarized in The Utility Reform Network's (TURN's) Comments on the Proposed Decision (which were coordinated with CforAT and other consumer groups), consumer groups and PG&E, the initial sponsor of the high-usage proposal, developed an agreed-upon set of safeguards to incorporate into the program. <i>See</i> also Belser Testimony at 6; 1/13 Response to ALJ Ruling at 1-3; Opening Brief at 17-23; and Reply Brief at 3-4.</p> <p>Opening Comments on PD at 7-8. <i>See</i> Revision 1 to Proposed Decision (Redline) at 223-227, showing discussion of safeguards (including referral to Medical Baseline and accessibility of notices) added in response to consumer input. All safeguards are included in the Final Decision. Final Decision at 217-220 (including accessible notices and referral to Medical Baseline).</p>	Verified

<p>CARE: Categorical Eligibility, PEV, Recertification</p> <ul style="list-style-type: none"> In conjunction with other consumer groups, CforAT worked to maintain CARE's emphasis on its 90% penetration goal, to maintain the effective categorical eligibility program and to ensure that post-enrollment verification and recertification processes are effective without being burdensome to consumers or screening out eligible households. 	<p>Belser Testimony at 6-10; 1/23 Response to ALJ Ruling at 3-6 (regarding PEV); 1/23 Joint Consumer Response to ALJ Ruling at 21-27; Opening Brief at pp. 14-17 (categorical enrollment) and 24-27 (PEV); Reply Brief at pp. 1-3; Opening Comments on PD at 5-7 (also expressing support for coordinated comments by other consumer groups).</p> <p>While not directly citing to CforAT's comments, the revisions to the PD make many of the changes advocated by CforAT and the other consumer groups. <i>See</i> PD Revision 1 (Redline) at 208-222 (making numerous changes responsive to consumer concerns).</p>	Verified
<p>ESAP: 15% Enrollment Goal</p> <ul style="list-style-type: none"> CforAT advocated for retention of the existing 15% Energy Savings Assistance Program (ESAP) enrollment goal for households including a person with a disability, and worked with the IOUs to ensure support for the enrollment goal, including the ongoing reporting requirement. 	<p>CforAT stressed the ongoing importance of the 15% ESAP enrollment goal and urged that the goal be maintained, and that the IOUs continue to be required to report on compliance with the goal. <i>See</i> Belser Testimony at 10-15; Opening Brief at 4-7. While declining to adopt recommended refinements to the enrollment process out of concern about micromanaging implementation efforts, the Final Decision maintains the enrollment goal and the reporting requirement. Final Decision at 268.</p>	Verified
<p>Effective Outreach/Communication</p> <ul style="list-style-type: none"> CforAT supported increased capitation fees, effective outreach to designated low-income communities, and accessible communications. 	<p>Belser Testimony at 14-15 (addressing need to effectively identify households containing a person with a disability); 1/13 Response to ALJ Ruling at 4-5 (targeted outreach) and 6 (capitation fees); Opening Brief at 8-11 and 23-24;</p>	Verified

<ul style="list-style-type: none"> The Final Decision adopted an increase in capitation fees; ensured that notices regarding the new High-Use Program would be accessible; and supported targeted outreach to vulnerable communities, among other items that address effective outreach and communication generally. 	<p>Opening Comments on PD at 9-10 (CARE outreach), 10-11 (capitation fees), 11-12 (ESAP outreach).</p> <p>Final Decision at 220-225 (Capitation fees); Final Decision at 221 (Notice forms for high-use customers must be accessible and high-usage program should include education on medical baseline); <i>see</i> also Final Decision at 66-70 (discussion on targeted outreach, including community based organizations, to communicate with hard-to-reach populations)</p>	
<p>ESAP: Non-Energy Benefits</p> <ul style="list-style-type: none"> CforAT stressed the importance of ensuring that NEBs be taken into consideration when determining measures for inclusion in the ESAP, particularly for those customers who gain more “quality of life” benefits than energy savings from home treatment. 	<p>Belser Testimony at 15-16 (addressing importance of “quality of life” benefits, including equity, safety and comfort); 1/23 Response to ALJ Ruling at 6-8; Opening Brief at 11-12; CforAT Reply Brief at 5-6.</p> <p>The final decision recognizes the importance of non-energy benefits, particularly for low-income consumers, and sets forth a plan to continue to evaluate the best way to evaluate non-energy benefits in conjunction with energy savings. Final Decision at 73-34.</p>	Verified

<p>CHANGES:</p> <ul style="list-style-type: none"> • CforAT supported the continuation of the CHANGES pilot and stressed the significance of ensuring that the program serves populations that have difficulty communicating in English due to a disability, most notably the deaf population. • CforAT has been active in the Resolution process authorizing further action with CHANGES to improve its effectiveness, and has worked with the office of the Public Advisor to provide information regarding deaf-oriented CBOs that may be a potential fit for the program • The final decision continued the CHANGES pilot program and authorized a study to collect additional data on the program for further review. CforAT has been engaged in the ongoing data review process. 	<p>CforAT Opening Comments on PD at 11.</p> <p>Joint Letter from CforAT and the Greenlining Institute in support of Resolution CSID – 005, October 25, 2011;</p> <p>Final Decision at 227-228 (discussing Resolution CSID – 005 and additional review of CHANGES to take place during Phase 2).</p>	<p>Verified</p>
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B. Duplication of Effort (§§ 1801.3(f) & 1802.5):

	Claimant	CPUC Verified
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding? ¹	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: Parties taking similar positions to CforAT on issues involving CARE include: Division of Ratepayer Advocates (DRA), TURN and the Greenlining Institute (Greenlining). There was also some similarity with the National Consumer Law		Verified

¹ The Division of Ratepayer Advocates (DRA) was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013), which was approved by the Governor on September 28, 2013.

<p>Center (NCLC).</p> <p>Parties taking similar positions to CforAT on certain issues involving the ESAP include: NCLC, in conjunction with the National Housing Law Project and the California Housing Partnership, and the Latino Business Chamber of Commerce of Greater Los Angeles, the National Asian American Coalition, and the Black Economic Council (collectively “Joint Parties”).</p> <p>Other active parties include each of the IOUs, the California Large Energy Consumers Association (CLECA), representatives of contractors who work through the ESAP, utility worker representatives, and environmental interests.</p> <p>In prior proceedings concerning CARE and ESA Programs (formerly known as LIEE), the interests of the disability community were represented by Disability Rights Advocates (DisabRA). Among other examples, DisabRA was found to have made a substantial contribution to D.08-11-031, issued in A.08-05-022 (2009-2011 program cycle) and D.07-12-051 in R.07-01-042 (providing policy direction for LIEE). <i>See</i> D.11-06-035 and D.09-03-042 for discussion of DisabRA’s contributions. In this proceeding, DisabRA never filed any documents or appeared as a part. However, preliminary work, including work reasonably done before the formal applications were filed, took place prior to the transition of advocacy roles before the Commission between DisabRA and CforAT. As has been previously noted in Commission filings, in the summer of 2011, Melissa Kasnitz, who had served as DisabRA’s Managing Attorney and led all practice before the Commission for DisabRA, transferred her ongoing practice to CforAT. Per a formal agreement between the organizations, CforAT adopted all prior filings by DisabRA in active proceedings, and otherwise worked to ensure a smooth transition, in which the leading advocates representing the disability community remained the same through the organizational shift. While there were no formal filings to adopt in this proceeding, the preliminary work done at DisabRA served as the foundation for participation by CforAT.</p> <p>The transition and the foundational work done by DisabRA were discussed in CforAT’s NOI, filed on September 7, 2011, at 3, noting that CforAT intended to include time spent by DisabRA as part of its eventual compensation request. No party objected to this issue when it was raised in CforAT’s NOI, nor did any party raise any other concern regarding the transition of advocacy between DisabRA and CforAT.</p>	
<p>d. Describe how you coordinated with ORA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party:</p> <p>On CARE issues in which CforAT’s position corresponded directly to positions taken by other consumer organizations, including DRA, TURN, and Greenlining,</p>	<p>CforAT’s effort to coordinate and avoid duplication on CARE issues is evident from its</p>

<p>CforAT worked directly with these groups to avoid duplication of effort. In particular, this included work to address the issues of high-usage CARE customers and issues surrounding categorical enrollment, post-enrollment verification and recertification. CforAT's coordination with other consumer organizations included preparation of joint testimony (specifically on the high-use issue), joint filings and participation in a joint ex parte strategy to effectively pursue the shared goals of the various consumer organizations. In preparing joint filings or coordinating on simultaneous filings, CforAT focused on those issues of greatest concern to its constituency, for example focusing on the importance of affordability in joint comments on the ALJ Ruling in January of 2011 and in comments on the PD. Where key issues were of concern to multiple consumer organizations, the groups coordinated to avoid duplication of effort, for example on both opening and reply comments on the PD.</p> <p>There was less direct overlap between CforAT's position on ESAP issues and the positions of other parties. CforAT did not focus on ESAP issues except to seek to preserve the 15% enrollment goal for customers with disabilities and to ensure effective outreach and communication. Where CforAT believed that positions taken by other organizations would be beneficial to people with disabilities, CforAT noted its support, but did not expend substantial effort to address issues that were effectively being addressed by other parties (for example, CforAT supported the position of NCLC on multi-family issues, but did not independently address this issue).</p> <p>Finally, as noted above, certain preliminary work, including work following up on issues raised during the prior program cycle and addressed before the current applications were filed, were done by DisabRA. While DisabRA never filed any documents in this proceeding and did not participate as an active party, its preliminary work was relied upon by CforAT, acting as its successor, and should be compensated as set forth below.</p>	<p>filings. Overall, CforAT's independent filings were duplicative of DRA, TURN, Greenlining, NCLC, NHPC and Joint Parties on several issues without concurrently complementing, supplementing, or contributing to them in a material degree. <i>See</i> part III.C. for disallowances.</p>
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PART III: REASONABLENESS OF REQUESTED COMPENSATION

A. General Claim of Reasonableness (§§ 1801 & 1806):

a. Concise explanation as to how the cost of Claimant's participation bears a reasonable relationship with benefits realized through participation	CPUC Verified
<p>While it is difficult to place an overall dollar value on CforAT's participation on behalf of California households including a person with a disability, there is no doubt that such households rely heavily on both CARE and ESAP, and that effective access to these programs permits low-income households including a person with a disability to obtain (or retain) substantial savings on their energy bills.</p>	<p>Preliminary hours requested for the work of DisabRA in CforAT's intervenor compensation claim are disallowed. DisabRA did not submit</p>

<p>The ESAP enrollment goal of 15% for households containing a person with a disability ensures that many such previously unserved households will receive an opportunity to lower energy bills in an ongoing manner. Given that the program targets slightly fewer than 1.1 million (M) households for participation over the current three-year cycle, the goal will ensure that the IOUs target 165,000 disabled households for inclusion. This program cycle, ESAP treated households are projected to save over 96 M kWh and over 5 M therms, for a total projected customer bill savings of over \$332 M. This roughly averages out as over 87 kWh and 4.5 therm savings per low-income household, or an average household bill savings of \$300, based on ESAP treatment. Based on these projections, this one aspect of the PD alone will result in \$49.5 M in bill savings for the targeted disabled households (15% of total projected savings), a figure that dwarfs the cost of CforAT's participation. Of course, the treated households also obtain non-energy benefits that are difficult to quantify.</p> <p>In addition to the retention of the enrollment goal, CforAT worked to highlight the importance of CARE and ESAP as a component of the Commission's obligation to provide affordable energy for low income customers, and to maintain categorical enrollment into CARE and ESAP, which is a highly important method of demonstrating eligibility for people with disabilities, who are likely to be enrolled in other assistance programs and who are also likely to have difficulty assembling detailed documentation to otherwise demonstrate eligibility. Similarly, CforAT's efforts to ensure that post-enrollment verification and recertification are structured so as to be effective without burdening participants is important to its constituency. Finally, CforAT's work on an effective response to extremely high-use customers will provide an opportunity for people who are high-users because of medical issues to be identified and enrolled in medical baseline, while generally preserving the strength of the fund by addressing a potential concern about misuse of the program. All of these efforts increase the accessibility of CARE and ESAP for disabled customers who may have more difficulty than other customers in participating in the enrollment and verification process. While this benefit is not easy to characterize in dollar figures, it provides a valuable service to the disabled community.</p>	<p>any formal filings to build the record and the Commission does not compensate preliminary research through the intervenor compensation program. As such, the cost of these hours does not bear a reasonable relationship with benefits realized through CforAT's participation. Other than this disallowance, overall the cost of CforAT's participation in the proceeding bears a reasonable relationship to the benefits to ratepayers in D.12-08-044.</p>
<p>b. Reasonableness of Hours Claimed.</p> <p>CforAT worked efficiently in this proceeding, which included numerous sets of comments, briefing, and workshops, and which addressed many issues. Once a PD was issued, CforAT (in conjunction with other consumers) engaged in substantial additional work that resulted in</p>	<p>The hours claimed on behalf of DisabRA in CforAT's intervenor compensation claim are unreasonable and are disallowed, as previously</p>

<p>favorable revisions before a final decision was issued.</p> <p>Throughout the proceeding, CforAT worked closely with DRA, TURN, and Greenlining primarily on CARE issues, including the proposal to review CARE customers with high usage and the various issues surrounding categorical enrollment, post-enrollment verification, and recertification. These organizations submitted joint filings where appropriate, and coordinated separate filings, allocating issues and expressing support</p> <p>While CforAT exceeded its NOI estimate on the number of hours expended (with more attorney hours and fewer advocacy hours), this was as a result of the numerous filings as well as the substantial effort expended to obtain revisions following the release of the initial proposed decision in this proceeding. Given the way that the proceeding developed and the benefits obtains, the overall number of hours expended was reasonable.</p>	<p>explained in Part III.A. Besides these hours, most of Center for Accessible Technology's claimed hours in this claim are reasonable. Minor disallowances for duplication have been made. <i>See</i> Part III.C.</p>
<p>c. Allocation of Hours by Issue</p> <p>General Low-Income Issues: 1% Includes work on affordability and the need for an updated Low Income Needs Assessment. CforAT notes that, while little time could be independently allocated to low-income/affordability issues, this effort made up a substantial portion of the mixed time, as it was a key factor stressed by CforAT in multiple filings.</p> <p>CARE Issues: 28%</p> <ul style="list-style-type: none"> • High Use: 3.6% • Categorical Enrollment, Post-Enrollment Verification & Recertification: 4.1% • General CARE: 19.9% <p>ESAP Issues: 10%</p> <ul style="list-style-type: none"> • 15% Enrollment Goal for Disabled households: <1% • Effective outreach and communication (includes capitation fees, accessible communication, targeted outreach and other efforts to ensure vulnerable consumers understand the CARE and ESAP programs): 3.2% • Non-Energy Benefits: 4.9% • General ESAP: 1.4% <p>Mix: 40% Time split among CARE/ESAP/Low Income Issues (within time designated as "Mix" the split is approximately 50% CARE, 30% Low-Income, and 20% ESAP)</p>	<p>Verified.</p>

CHANGES: 3% General Participation: 18% Percentages set forth above are rounded. In its NOI, CforAT characterized the issues slightly differently, but noted virtually all the same categories except for issues concerning the CHANGES program. CforAT did not provide specific allocation estimates in its NOI.	
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B. Specific Claim:

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
Melissa W. Kasnitz (DisabRA)	2011	20.2	\$420	D.12-03-051	\$8,484.00	0	\$420	\$0
Karla Gilbride (DisabRA)	2011	10.0	\$210	D.12-03-051	\$2,100.00	0	\$210	\$0
Melissa W. Kasnitz (CforAT)	2011	95.0	\$420	See comments, below.	\$39,900.00	79.8	\$420	\$33,516.00
Dmitri Belser (CforAT)	2011	8.1	\$225	See comments, below.	\$1,822.50	6.8	\$225	\$1,530.00
Melissa W. Kasnitz (CforAT)	2012	148.6	\$445	See comments, below.	\$66,127.00	124.82	\$430	\$53,672.60
	Subtotal:				\$118,433.50	Subtotal:		\$88,718.60
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
Paralegal (DisabRA)	2011	12.7	\$110	D.10-07-013	\$1,397.00	0	\$110	\$0
	Subtotal:				\$1,397.00	Subtotal:		\$0

INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
Melissa W. Kasnitz (CforAT)	2011	2.7	\$210	½ standard rate, <i>see</i> comments below.	\$567.00	2.7	\$210	\$567.00
Melissa W. Kasnitz (CforAT)	2012	11.0	\$225.50	½ requested standard rate, <i>see</i> comments below.	\$2,447.50	11	\$215	\$2,365.00
	Subtotal:				\$3,014.50	Subtotal:		\$2,932.00
COSTS								
#	Item	Detail			Amount	Amount		
	Travel (CforAT)	BART round-trip (\$7.00 each) 05/30/12 - Attend Ex Parte Meeting (Florio) 06/05/12 - Attend Ex Parte Meetings (Peevey, Ferron) 06/13/12 - Attend Ex Parte Meeting (Sandoval) 06/25/12 - Attend all-party meeting 06/27/12 - Attend Ex Parte Meeting (Simon) BART round-trip (\$7.10 each) 07/31/12 - Attend Ex Parte Meetings on revisions to PD			\$42.10			\$0
	Postage (CforAT)	Mailing hard copies of service documents to ALJ and Assigned Commissioner			\$16.92			\$16.92
	Printing/Copies (CforAT)	CforAT does not request costs for printing or copying documents in-house. However, CforAT does not have equipment to support large document production or print jobs.			\$183.50			\$28.50

PROPOSED DECISION

		<p>For these, CforAT has arranged to use the equipment of Disability Rights Education and Defense Fund (DREDF), which tracks the costs and charges \$0.25 per page.</p> <p>In this proceeding, CforAT printed the Proposed Decision and the first revision to the Proposed Decision on DREDF's equipment to allow for effective review, comment and participation in the all-party meeting.</p> <p>May 2012: 348 p. @ \$0.25/p = \$87.00</p> <p>July 2012: 386 p. @ \$0.25/p = \$96.50</p>			
	Printing/Copies (DisabRA)	Disability Rights Advocates' costs include in-house printing and copying costs for documents that were deemed relevant to issues of concern for its constituency.	\$128.75		\$0
Subtotal:			\$371.27	Subtotal:	\$45.42
TOTAL REQUEST \$:			\$123,216.27	TOTAL AWARD \$:	\$91,696.02
<p>* We remind all intervenors that Commission staff may audit its records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Claimant's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate.</p>					

Attorney	Date Admitted to CA BAR²	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Melissa Kasnitz	December 24, 1992	162679	No. Please note from January 1, 1993 until January 25, 1995 and January 1, 1996 until February 19, 1997 Kasnitz was an inactive member of the California Bar.
Kara Gilbride	July 17, 2009	264118	No

C. CPUC Disallowances, Adjustments, and Comments:

#	Reason
Hourly Rate for Melissa Kasnitz 2011 and 2012	Center for Accessible Technology requests an hourly rate for Melissa Kasnitz of \$420 for 2011 and \$445 for 2012. The Commission adopted a 2011 hourly rate of \$420 for Kasnitz in D.11-10-012. The Commission has adopted an hourly rate of \$430 for Kasnitz in D.13-04-008. We apply these rates in this decision.
Hourly Rate for Dmitri Belser 2011 and 2012	Center for Accessible Technology requests an hourly rate for Dmitri Belser of \$225 for 2011. The Commission adopted a 2011 hourly rate of \$225 for Belser in D.13-02-014. We apply this rate in this decision
Disallowance of Travel Expenses	Center for Accessible Technology requests \$42.10 in BART travel costs. The Commission considers travel within the radius of approximately 120 miles (one way) to and from San Francisco as routine and is not compensated. ³ Center for Accessible Technology’s office is in Berkeley, California, thus within the radius that that Commission considers as routine. We disallow compensation for the \$42.10 in travel expenses.

² This information may be obtained at: <http://www.calbar.ca.gov/>.

³ D.09-12-040.

Disallowance for Printing Expenses	Center for Accessible Technology requests \$242.22 in printing expenses. Center for Accessible Technology filed 285 pages of motions, briefs, comments, certificates of service, and testimony. After review of Center for Accessible Technology's filings, printing expenses of \$28.50 are reasonable to reflect the printing necessary and directly related to Center for Accessible Technology's participation in the proceeding to fulfill its service requirements, at the reasonable rate of \$.10 per page.
Disallowance of Disability Rights Advocates Hours	Center for Accessible Technology's claim seeks \$12,109.75 in compensation on behalf of Disability Rights Advocates. Disability Rights Advocates did not participate or file any formal filings in this proceeding and is not entitled to compensation for preliminary work performed before the budget applications were filed. Center for Accessible Technology was involved in A.11-05-017, <i>et al.</i> , as a party since the early stages of the proceeding (prior to the prehearing conference) and remained active through the issuance of D.12-08-044. All hours attributed to the work of Disability Rights Advocates is disallowed.
Reduction of Hours for Excessive Duplication	Center for Accessible Technology's time is reduced by 16%. Center for Accessible Technology's position was duplicative of positions taken by several other consumer groups including the ORA, TURN, Greenlining, NCLC, NHPC, and Joint Parties on issues pertaining to affordability, high usage, category eligibility, plug-in electric vehicles, Energy Savings Assistance Program enrollment goals, outreach, non-energy benefits, and the Community Help and Awareness of Natural Gas Service program. Further coordination with other parties should have taken place to reduce the excessive duplication of efforts.

PART IV: OPPOSITIONS AND COMMENTS

**Within 30 days after service of this Claim, Commission Staff
or any other party may file a response to the Claim (see § 1804(c))**

A. Opposition: Did any party oppose the Claim?	No
B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(2)(6))?	Yes

FINDINGS OF FACT

1. Center for Accessible Technology has made a substantial contribution to Decision 12-08-044.
2. The requested hourly rates for Center for Accessible Technology's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$91,696.02.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Public Utilities Code §§ 1801-1812.

ORDER

1. Center for Accessible Technology is awarded \$91,696.02.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company shall pay Center for Accessible Technology their respective shares of the award, based on their California-jurisdictional gas and electric revenues for the 2012 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning January 12, 2013, the 75th day after the filing of Center for Accessible Technology's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision? No
Contribution Decision(s):	D1208044	
Proceeding(s):	A1105017, A1105018, A1105019, A1105020	
Author:	ALJ Kimberly H. Kim	
Payer(s):	Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Southern California Gas Company	

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier	Reason Change/Disallowance
Center for Accessible Technology	10/29/2013	\$123,216.27	\$91,696.02	No	Applied hourly rates lower than requested, reduction for excessive duplication, disallowance of travel expenses and some printing expenses, disallowance of hours from Disability Rights Advocates

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Melissa	Kasnitz	Attorney	Center for Accessible Technology	\$420	2011	\$420
Melissa	Kasnitz	Attorney	Center for Accessible Technology	\$445	2012	\$430
Demitri	Belser	Expert	Center for Accessible Technology	\$225	2011	\$225

(END OF APPENDIX)